

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHIRLEY MOORE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 16 cv 2861
	)	
VILLAGE OF SAUK VILLAGE, OFFICER	)	Judge Bucklo
REBECCA SAILSBERRY, #02, GARY	)	
LUKE, #128, OFFICER JOSHUA MORRIS,	)	
#122, OFFICER CHAD FREDERICKSON,	)	
#106, and OFFICER JACOB HOWARD, #114,	)	
	)	
Defendants.	)	

**Report of Parties' Planning Meeting**

1. **Meeting.** Pursuant to FED. R. CIV. P. 26(f), a meeting was held on electronically and was attended by: counsel for all parties.
2. **Pretrial Schedule.** The parties jointly propose to the court the following discovery plan:
  - Plaintiff(s) to amend pleadings by 12/31/16.
  - Plaintiff(s) to add any additional parties by 12/31/16.
  - Defendant(s) to amend pleadings by 12/31/16.
  - Defendant(s) to add any additional parties by 12/31/16.
3. **Discovery.** Discovery will be needed on the following subjects: whether the individual defendants violated Plaintiff's constitutional rights and whether the police department has a policy of violating constitutional rights.  
Defendant Sailsberry proposes: Discovery will be needed as to the following subjects: (1) Each individual defendant's personal participation, if any, in the alleged civil rights violations; (2) to what extent, if any, the police department had a policy of violating constitutional rights at the time plaintiff's alleged incident; (3) Plaintiff's alleged damages including, but not limited to, her alleged psychiatric and mental distress damages; (4) and plaintiff's alleged pre-existing psychiatric conditions.
  - a. Disclosures pursuant to Pursuant to FED. R. CIV. 26(a)(1) to be made by July 1, 2016. Defendant Sailsberry proposes: July 15, 2016.
  - b. Fact discovery to be commenced in time to be completed by December 31, 2017. Defendant Sailsberry proposes: February 28, 2017.

- c. Parties disagree on the expected number of depositions. Plaintiff anticipates the parties will need approximately 15-20 depositions, Defendants Sauk Village and Salsbery anticipate the need for 8-10.
  - d. Reports from retained experts under Rule 26(a)(2) due: 1/31/17  
Date for plaintiff to comply with FRCP(26)(a)(2): 3/1/17  
Date for defendant to comply with FRCP(26)(a)(2):3/1/17  
All expert discovery to be completed by May 1, 2017.
  - e. All potentially dispositive motions should be filed by June 15, 2017.
  - f. Final pretrial order: Plaintiff to prepare proposed draft by November 1, 2017; parties to file joint final pretrial order by November 15, 2017.
  - g. The case should be ready for trial by January 1, 2018, and at this time is expected to take approximately two weeks.
4. **Settlement.** At least 14 days prior to the Rule 16(b) scheduling conference, plaintiff(s) is directed to make a written settlement demand to the defendant(s). At least 7 days prior to the scheduling conference defendant(s) is to respond in writing to the plaintiff(s) settlement demand.
5. **Consent.** Parties do not consent unanimously to proceed before a Magistrate Judge.

Date: June 15, 2016

Respectfully Submitted,

s/ Jeanette Samuels  
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One of Plaintiff's Attorneys

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